

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re:

SPECIALTY RETAIL SHOPS HOLDING
CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-80064 (TLS)

(Jointly Administered)

Re: Docket Nos. 1966, 1968 & 2005

**9013-1 NOTICE OF FILING OF MOTION FOR RELIEF FROM THE
ORDER GRANTING MOTION OF DEFENDANTS PURSUANT TO CONFIRMATION
ORDER TO DETERMINE WHETHER CAUSES OF ACTION ARE PROPERTY OF
THE DEBTORS' ESTATES, AND REQUEST FOR HEARING**

PLEASE TAKE NOTICE that on October 11, 2019, CGP Canadian, LTD; GGSK Tulia, LTD; CGP Seymour, LTD; CGP Orofino, LLC; CGP Comanche, LTD; CGP Jacksboro, LTD; CGP Cotulla, LTD; CGP Prosser, LLC; and CGP Clifton, LTD (the "CGP Landlords") as creditors and parties in interest, filed their *Motion for Relief From The Order Granting Motion Of Defendants Pursuant to Confirmation Order To Determine Whether Causes Of Action Are Property Of the Debtors' Estates* [Doc. 2005] (the "Motion") with the United States Bankruptcy Court for the District of Nebraska.

By agreement of the parties, any Response or Resistance must be filed on or before **November 1, 2019** with the United States Bankruptcy Court for the District of Nebraska, Roman L. Hruska Courthouse, 111 South 18th Plaza, Suite 1125, Omaha, Nebraska 68102 and served on (i) counsel to the Landlord Plaintiffs, Benton & Centeno, LLP, 2019 Third Avenue North,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Specialty Retail Shops Holding Corp. (0029); Pamida Stores Operating Co., LLC (6157); Pamida Transportation, LLC (4219); Penn-Daniels, LLC (0040); Place's Associates' Expansion, LLC (7526); Retained R/E SPE, LLC (6670); Shopko Finance, LLC (1152); Shopko Gift Card Co., LLC (211); Shopko Holding (6346); ShopKo Properties, LLC (0865); ShopKo Stores Operating Co., LLC (6109); SVS Trucking, LLC (0592). The location of the Debtors' service address is: 700 Pilgrim Way, Green Bay, Wisconsin 54304.

Birmingham, Alabama 35203, Attn: Lee R. Benton; (ii) the U.S. Trustee; and (III) any other entity designated by the Court.

If no Response is filed on or before the date set forth above, the Bankruptcy Court may enter an Order on the Motion without further notice or opportunity to be held.

Further, in the event that a Response is filed, a Reply to such Response must be filed on or before **November 18, 2019** with the United States Bankruptcy Court for the District of Nebraska, Roman L. Hruska Courthouse, 111 South 18th Plaza, Suite 1125, Omaha, Nebraska 68102 and served on (i) counsel for Defendants, Sun Capital Partners Group, Inc., Sun Capital Partners, IV, LP, and Sun Capital Management, LLC, Morgan, Lewis & Bockius LLP, One Federal Street, Boston, MA 02110-1726, Attn: Andrew J. Gallo; counsel for Defendant, KLA-Shopko, LLC, Ballard Spahr LLP, 1735 Market Street, 51st Floor, Philadelphia, PA 19103-7599, Attn: Stephen J. Kastenbergs; and counsel for Debtors, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, NY 10022, Attn: Steven Serajeddini; and Kirkland & Ellis LLP, 300 North LaSalle, Chicago, IL 60654, Attn: Travis Bayer, (ii) the U.S. Trustee; and (III) any other entity designated by the Court.

A hearing on the Motion will be held in the Roman L. Hruska Courthouse, 111 South 18th Plaza, Suite 1125, Omaha, Nebraska, at a date established by the Court.

Filed this the 17th day of October, 2019.



/s/ Lee R. Benton

Lee R. Benton (ASB8421E63L)
Samuel C. Stephens (ASB0400X11T)
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CERTIFICATE OF SERVICE

I certify that on the 17th day of October, 2019, I filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, and further certify that on the same date I mailed by United States postal service, postage prepaid, the document to the non-CM/ECF participants named on the matrix below.

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/s/ Lee R. Benton
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